

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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| IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION | MDL No. 2875 |
| THIS DOCUMENT RELATES TO ALL CASES | HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK) |

**CERTIFICATION OF C. BRETT VAUGHN IN SUPPORT OF
PLAINTIFFS' REPLY BRIEF IN SUPPORT OF *DAUBERT* MOTION TO EXCLUDE
TESTIMONY OF JON P. FRYZEK, MPH, PH.D.**

C. BRETT VAUGHN, hereby certifies as follows:

1. I am an attorney at law within the State of Kansas with the Hollis Law Firm, and serve on the Plaintiff's Executive Committee. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Plaintiffs' reply brief in support of *Daubert* motion to exclude the testimony of Jon P. Fryzek, MPH, Ph.D.

2. Attached hereto as **Exhibit S** is a true and accurate copy of ZHP02563327 Deviation Investigation Report, Investigation Regarding Unknown Impurity (Genotoxic Impurity) of Valsartan API (TEA process), Annex 1c.2, DCE-18003 V2 for valsartan, 2018.

HOLLIS LAW FIRM
Attorneys for Plaintiffs

Dated: January 6, 2022

By: /s/ C. Brett Vaughn
C. Brett Vaughn RN, BSN, JD